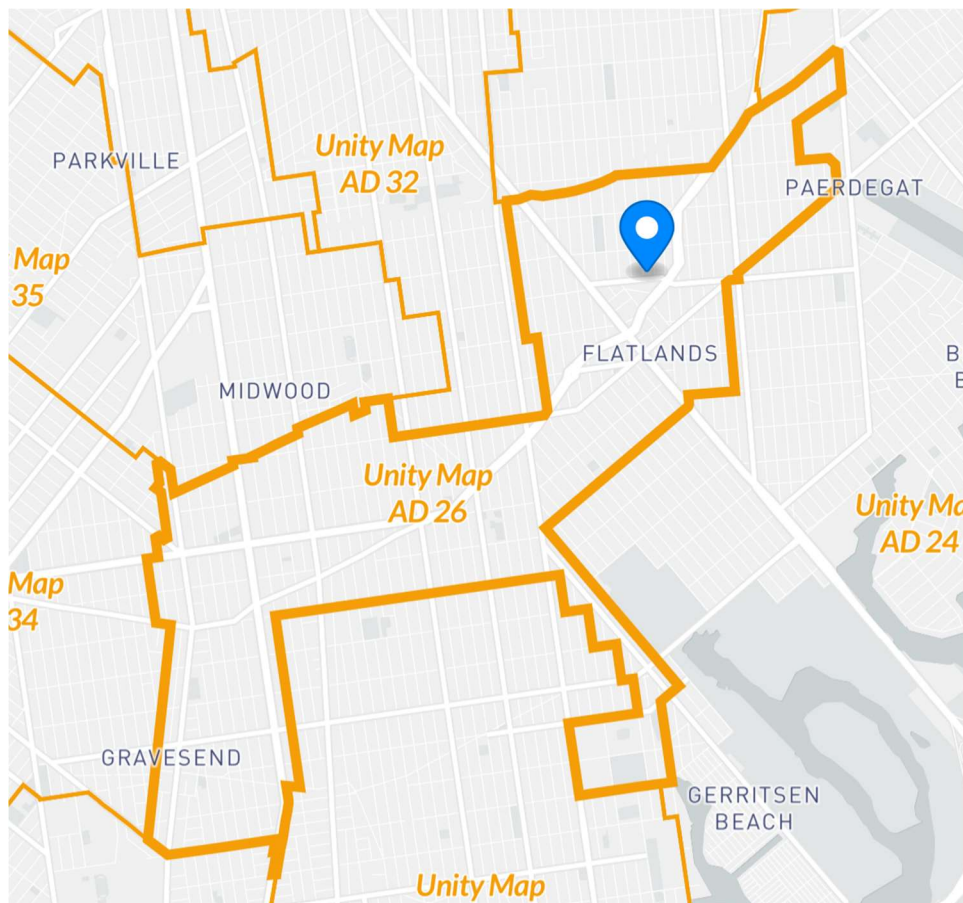


From the public hearings and submissions, it's obvious that the Unity Map Coalition have mounted a coordinated campaign with affiliates to promote their district lines. They claim their maps are superior. Some witnesses even made reference to the Voting Rights Act. Considering how minority candidates are increasingly winning elections across New York in non-minority districts, that was unconvincing. But given their prominence at Commission hearings, I wanted to offer objections and provide examples how their proposals are inferior.

State Legislative Districts

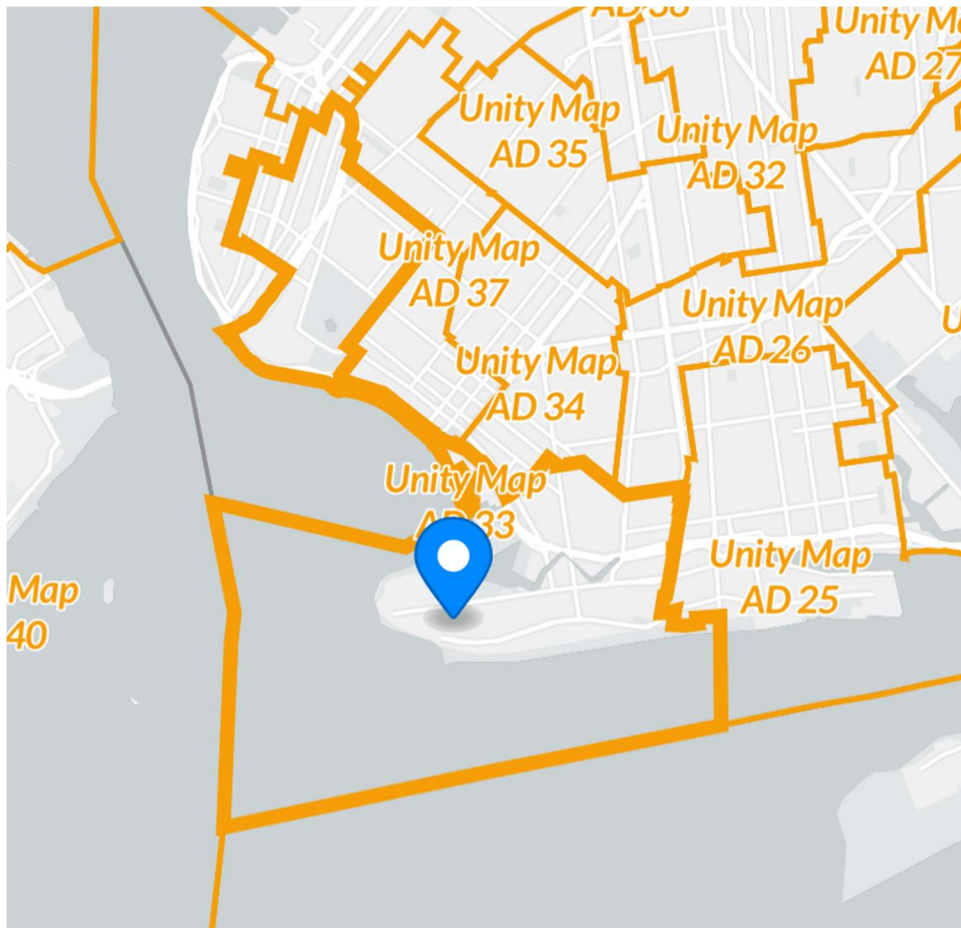
1. Unity Map AD26

Unity Map AD26 is a deer. Or maybe an elephant. This proposed Assembly district does not correspond to any distinct community. It includes parts of Gravesend, Midwood, Homecrest, Marine Park, Flatlands, East Flatbush, plus a tendril to the Sheepshead Bay Houses. Unity Map Coalition members often claim to be civil rights groups and to promote voting rights. These lines aren't consistent with that.



2. Assembly District 46

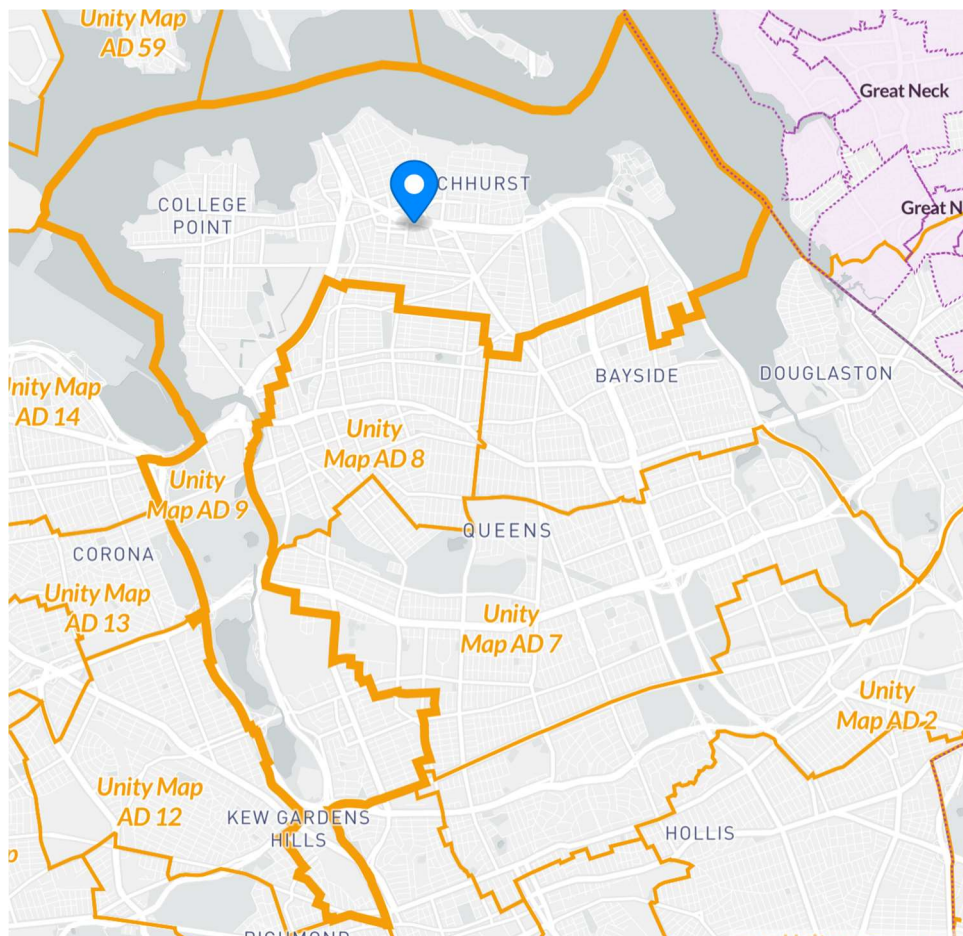
The current Assembly District 46 consists of Bay Ridge and Dyker Heights joined to the western part of Coney Island by a narrow band of the Belt Parkway. Both the Letters and Names plans end the gerrymander, proposing instead a single district for Coney Island from Sea Gate in the west to Manhattan Beach in the east. But the Unity Map maintains the current configuration, adding the Marlboro Houses and shifting the upper part of the district toward Democratic leaning areas in northern Bay Ridge. This would entrench gerrymandering.



3. Assembly District 27

The current Assembly District 27 consists of a southern branch (Kew Gardens Hills, Pomonok, Electchester, Kew Gardens, parts of Rego Park and Forest Hills) joined to a northern branch (College Point, Malba, part of Whitestone) by a swath of Flushing Meadows Corona Park. Both the Letters and Names plans expand the northern branch by extending it toward Bayside. The Unity Map removes Pomonok and Electchester, divides Kew Gardens, and extends the northern branch all the way to Fort Totten.

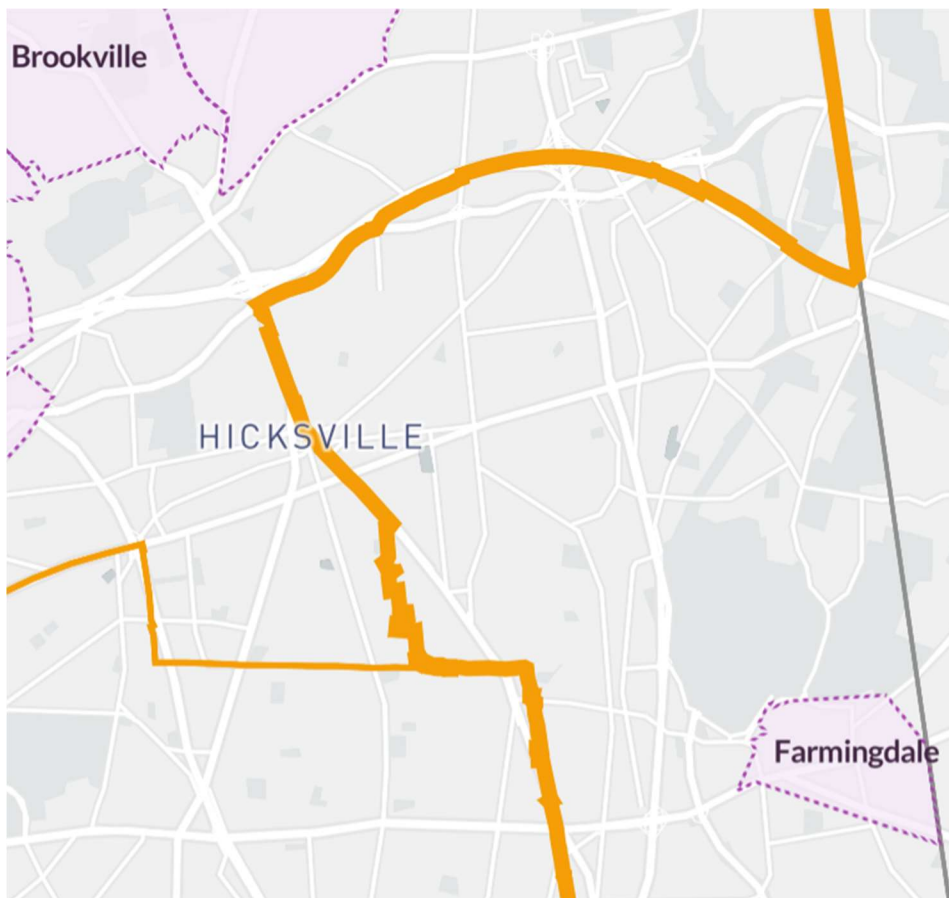
All these proposals appear to separate Orthodox communities in Hillcrest from those in nearby Kew Gardens Hills. Neighborhoods directly adjacent such as Briarwood would appear ideal for inclusion in Assembly District 27. Since these adjacent areas are covered by the same police, fire, public schools, bus lines, and numerous other services. Which is why they're drawn together that way in New York City Council District 24.



Congressional Districts

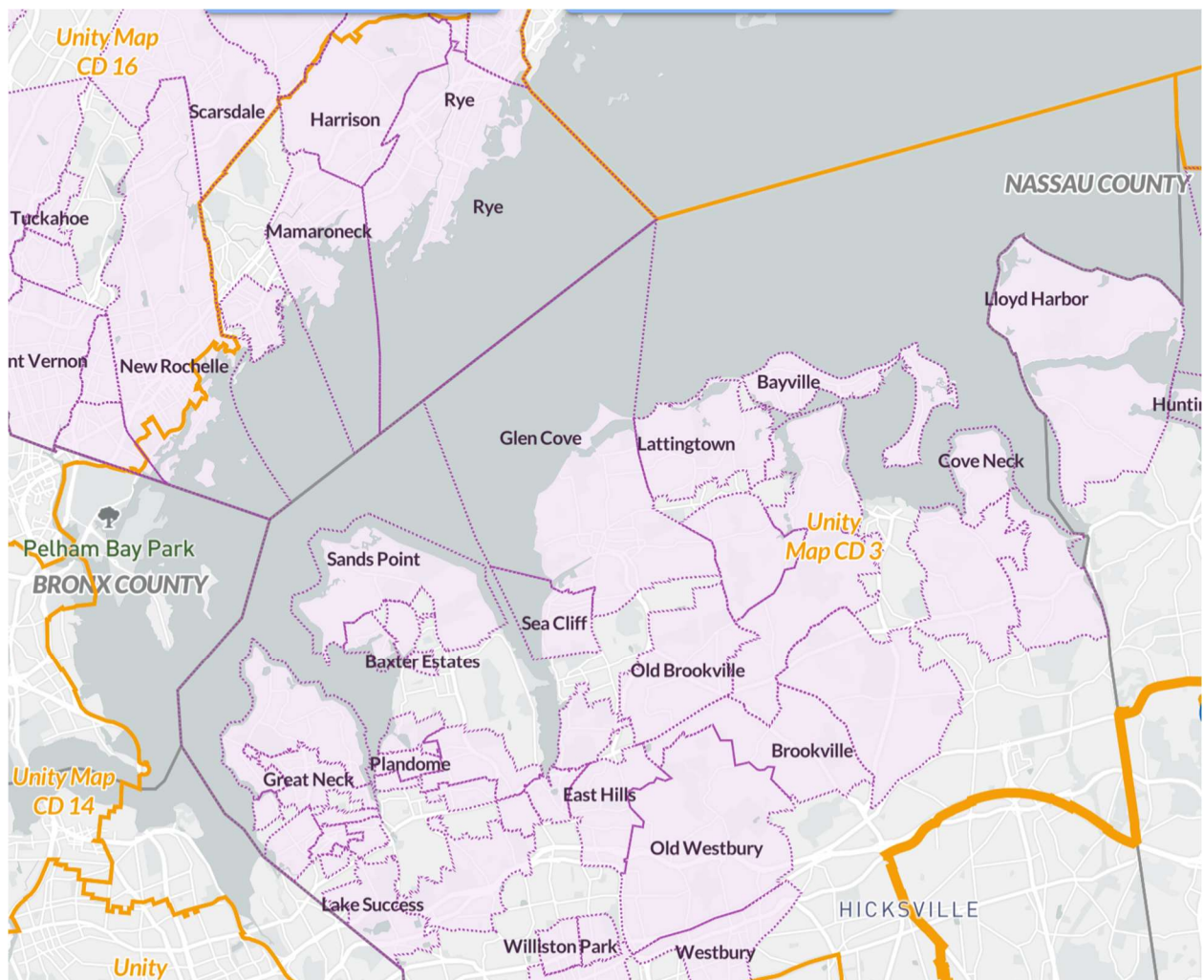
1. Hicksville

In Nassau County, the Town of Oyster Bay contains a large and visible multi-ethnic Asian community in Hicksville, Jericho and Syosset. While still a minority in most tracts, 2020 Census results document a population in the tens of thousands. This is reflected in the presence of H Mart in Jericho, Patel Brothers in Hicksville and numerous other Asian grocery stores in the area. Current district lines place it entirely in NY-3. The Letters plan places it in a proposed NY-2. But the Unity Map divides the Asian community using the Northern State Parkway and Broadway, a divide that does not correspond to any village, town, or county line. The Unity Map is clearly detrimental to the Hicksville community.



2. Northeastern Queens and NY-3

Current Congressional lines split northeastern Queens between NY-14, NY-6 and NY-3, clearly dividing conservative leaning areas. The Unity Map reinforces this and other incumbent protections in New York City. With NY-3, the Unity Map adds small neighborhoods in the Bronx (Country Club and City Island) and large swaths of Westchester County facing the Long Island Sound. Their proposed NY-3 would include parts of five separate counties: Suffolk, Nassau, Queens, Bronx, Westchester. While Upstate districts often encompass several low population counties, that isn't necessary Downstate because of high population density. The Unity Map disregards the importance of compactness to constituents.

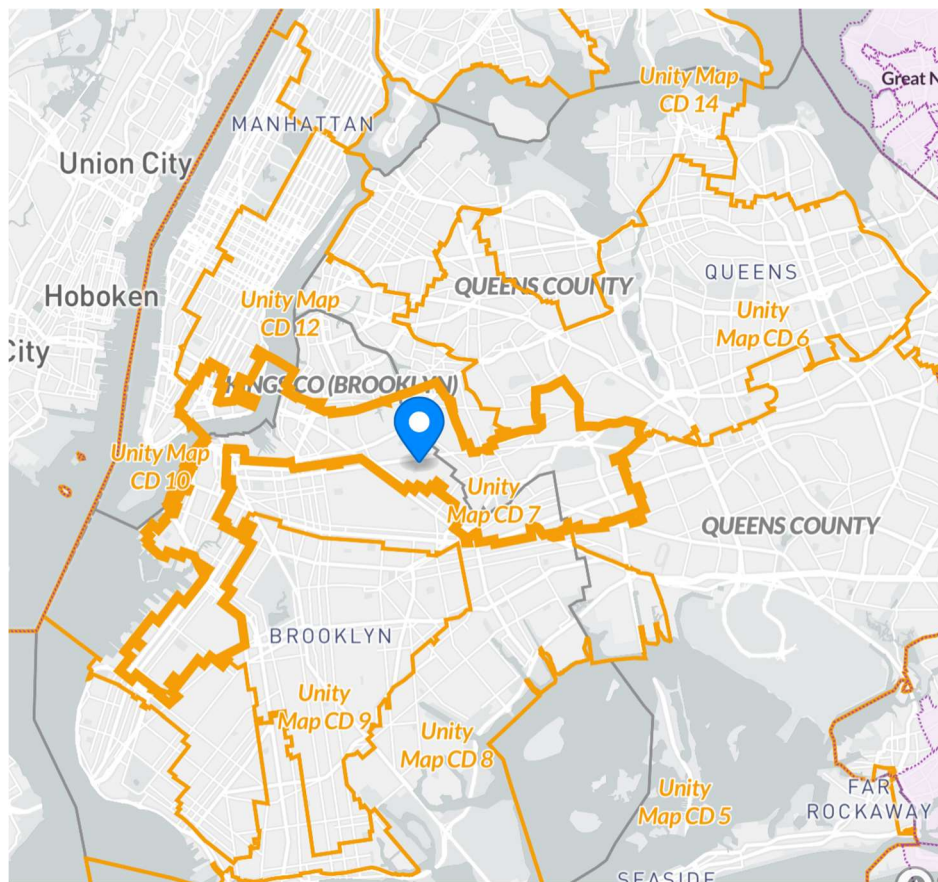


3. Sunset Park and Southern Brooklyn.

Contrary to the Unity Map, Sunset Park should not be in the same Congressional district as Chinatown. They're separated by about 8 miles. To reach Chinatown from Sunset Park you have to traverse several affluent neighborhoods with few working class or Asian residents (Park Slope, Boerum Hill, Brooklyn Heights, Dumbo) and also cross the East River. By contrast, the working-class neighborhoods of Sunset Park, Dyker Heights, Bath Beach, Bensonhurst, Gravesend and Sheepshead Bay are all adjacent and contain large Asian immigrant communities. Sunset Park belongs with other southern Brooklyn neighborhoods in Congressional redistricting.

The Hispanic population in NY-7 has declined from 43% to 37% over the past decade. Despite lengths to engineer the sprawling three-borough gerrymander, the continued existence of NY-7 is untenable. The incumbent doesn't even live in the district according to press reports. Meanwhile, southern Brooklyn has seen growth in the Latino population as housing costs and household formation drives residents from northern Brooklyn to more affordable areas such as Bensonhurst. This is obvious from the Census data.

The Unity Map would expand the three-borough gerrymander by cracking Republican leaning neighborhoods in central Queens including Middle Village and Glendale. Transferring parts of them from NY-6 to NY-7 would be an obvious partisan gerrymander to benefit to the Democratic incumbent in NY-6. And without any apparent benefit to central Queens residents.



4. Manhattan

The Unity Map Congressional districts favor Manhattan incumbents to the detriment of residents of other boroughs and renders our communities largely powerless. There is no substantive difference between the affluent East and West Sides of Manhattan that merits separate congressional districts for each of them. They're socioeconomically, demographically identical. And the only way you can maintain separate East and West Side districts is to reach deep into Queens and Brooklyn for population, areas with large immigrant populations and often lower voter engagement.

Any purported benefit from incumbent seniority is offset by the expected change in Congressional control that historically occurs after a new president is elected. The current incumbents for NY-7, NY-10, and NY-12 are 68, 74, and 75 years old respectively. Given average American life expectancy, it's with high certainty their Congressional careers will end before the next redistricting. We shouldn't have to suffer for another decade. Maintaining the current configuration just does not benefit residents outside Manhattan.

The Unity Map Coalition and its member organizations don't speak for the entirety of the minority community. The Asian American Legal Defense and Education Fund (AALDEF) is a coalition member. But I can't recall anything good they've ever done for my community. When I went to their website a few weeks ago, the first thing I came across was a press release stating that President Biden has positive approval in their polling of Asian Americans. Didn't exactly bolster confidence that the Unity Map is non-partisan.

<https://www.aaldef.org/press-release/aaldef-exit-poll-asian-americans-in-5-states-approve-of-biden-approve-of-the-vaccine-mandate-and-support-abortion-access/>

I hope the Commission takes a critical view of the Unity Map Coalition proposals. They certainly don't deserve greater weight in deliberations than feedback from any other member of the public.